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July 17, 2014

**VIA EMAIL AND REGULATION.GOV**

Douglas Aburano  
Chief, Attainment Planning and Maintenance Section  
Air Programs Branch (AR-18)  
U.S. Environmental Protection Agency  
77 West Jackson Boulevard  
Chicago, Illinois 60604  
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**Re: Approval and Promulgation of Air Quality Implementation Plans; Ohio;  
Particulate Matter: Proposed Rule; Supplemental  
ATTN: Docket ID No. EPA-R05-OAR-2005-OH-0002  
*Our File No. 043590***

Dear Mr. Aburano:

On June 26, 2014, U.S. EPA issued a supplemental proposal: "Approval and Promulgation of Air Quality Implementation Plans; Ohio; Particulate Matter: Proposed Rule; Supplemental." 79 Fed. Reg. 36277 (June 26, 2014). In that proposed rule, U.S. EPA noted that in 2005, U.S. EPA had proposed to approve portions of Ohio EPA's PM SIP and to disapprove a provision of Ohio EPA's PM SIP – specifically disapproval of Ohio Adm.Code 3745-17-03(B)(1), which provides for the optional use of COMS data for enforcing opacity limitations. While U.S. EPA finalized the rules it proposed to approve, it never finalized the proposed disapproval. Thus, nine years after the proposed disapproval, U.S. EPA is reopening the comment period on this proposed disapproval.

This letter is submitted on behalf of the Ohio Utility Group and its member companies ("OUG" or "the Utilities"),<sup>1</sup> which is an association of individual electric utilities in the State of Ohio. The Utilities request an additional **90 days** to comment on this proposal. Because U.S. EPA has not acted on this proposal in nine years, additional time is warranted. The Utilities believe this additional time is necessary because it will be necessary to locate and analyze the previous comments

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<sup>1</sup> The member companies include: AEP Generation Resources Inc., Buckeye Power, Inc., The Dayton Power and Light Company, Duke Energy Ohio, FirstEnergy Solutions, and Ohio Valley Electric Corporation.

Douglas Aburano

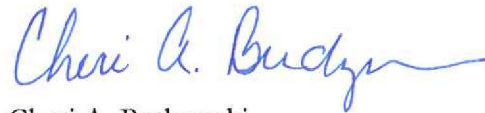
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that the Utilities submitted to both Ohio EPA and U.S. EPA. Further, the Utilities will need additional time to determine if any other regulations that have been adopted or implemented over the past nine years have impacted the Utilities' prior position on the proposed disapproval.

The Utilities thank you for your time in considering an extension of time for the comment period.

Very truly yours,

A handwritten signature in blue ink that reads "Cheri A. Budzynski". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Cheri A. Budzynski

CAB\bd